

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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RYAN J. NEGRI and PHILIP NEGRI,

Plaintiffs,

Civil Action No.
14-cv-10233 (GHW)

-against-

MICHAEL J. FRIEDMAN, ARTHUR
FRIEDMAN, FIRST ASCENT, LLC,
and P.J. LOUIS,

Defendants.

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REQUEST FOR ENTRY OF DEFAULT

TO: RUBY J. KRAJICK, CLERK OF THE COURT
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Plaintiffs, Ryan J. Negri and Philip Negri ("Plaintiffs") respectfully request entry of default, pursuant to Fed. R. Civ. P. 55(a), against defendant Michael J. Friedman ("Friedman") for his failure to appear or otherwise respond to the Complaint within the time specified by the Federal Rules.

As set forth in the accompanying Affidavit, on January 21, 2015, the Complaint, Summons and all other initiating documents in this action were served upon defendant Michael J. Friedman ("Friedman") by delivering a copy of the same to a person of suitable age and discretion to his actual place of business, followed by mail. An affidavit of service, certifying that the foregoing service was completed, was filed with the Court on February 12, 2015. More than 21 days have elapsed since service was performed.

Friedman has not been granted any extension of time to respond to the Complaint, or serve and answer or other response on Plaintiffs' attorney of record.

A proposed Certificate of Default is submitted for the Court's convenience.

Dated: White Plains, NY
May 4, 2015

DENLEA & CARTON LLP

By: /s/ Joanna Sandolo
Jeffrey I. Carton (JC-8296)
Joanna Sandolo (JS-9187)
2 Westchester Park Drive, Suite 410
White Plains, NY 10604
(914) 331-0100
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I, Joanna Sandolo, certify that on May 4, 2015 I served the foregoing Request for Entry of Default, Affidavit for Certificate of Default and proposed Clerk's Certificate of Default on defendant Michael J. Friedman by mailing the same via first class mail to his last known place of business:

280 Madison Avenue, Suite 1005
New York, NY 10016

Dated: White Plains, NY
May 4, 2015

/s/ Joanna Sandolo
Joanna Sandolo